Application Serial No.: 09/766,407 Attorney Docket No.: 23415-007 Customer Number: 29315

Reply and Amendment Under 37 C.F.R. §1.111

**REMARKS** 

Claims 1-24 are all the claims pending in this application. Reconsideration and allowance of all the rejected claims are respectfully requested in view of the following remarks.

**CLAIM OBJECTIONS** 

Claims 7 and 13 are objected to for informalities. These claims have been amended to overcome this objection.

REJECTION UNDER 35 U.S.C. §102(e)

Claims 1-24 stand rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Traversat, *et al.* (U.S. Patent No. 6,052,720). Applicants respectfully traverse this rejection on the following basis.

Independent claims 1 and 13 essentially recite creating the at least one image of a device and customizing the at least one image to form at least one customized image, among other things. In an exemplary embodiment, an administrator (or other authorized entity) may create an image of a device (see the specification at page 10, lines 10-11). The administrator may set up a workstation to hold a "golden" copy of the desired workstation for business or other applications (see the specification at page 10, lines 14-16).

Traversat et al. is directed to a system for providing a data framework and associated client/server protocol for storing and exchanging data among computers in a network (see Traversat et al., the Abstract). Traversat et al. discloses that the data schema allows a network administrator to manage configuration information for each of

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the computers in the network from a central repository such as a single server (see Traversat et al., col. 6, lines 19-23). Thus, any software updates, version upgrades, or installation of new applications that require knowledge of and access to a subsystem configuration can be implemented from the central repository and propagated to the individual clients (see Traversat et al., col. 6, lines 19-23). While Traversat et al. appears to disclose a system for managing configuration information computers in the network, Traversat et al. is deficient because it fails to teach or suggest creating an image of a device. Applicants respectfully disagree with the Examiner's position that Traversat et al. discloses that "configuration information is considered an 'image' of the client computer, as it comprises information relating to memory, storage, applications, and other features representing the overall configuration state of the client computer (for example, see column 8, line 60 – column 9, lines 10)" (see page 3 of the October 28, 2003 Office Action).

The cited portion of Traversat et al. is directed to the structure of the machine namespace 303 (see Traversat et al., col. 8, lines 60-66). Under a particular manufacturer, such as com. Sun, there are a number of entries shown, where each entry refers to a particular model or type of computer made by the manufacturer (see Traversat et al., col. 8, line 66 to col. 9, line 4). Under each computer type or model are leaf nodes 409 that specify application configurations for that particular type of computer (see Traversat et al., col. 9, lines 4-6). However, an application configuration is not the same as an image which enables the administrator to set up a workstation to hold a "golden"

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copy of the desired workstation for business or other applications (see the specification at page 10, lines 14-16).

Traversat et al. is also deficient because it fails to teach or suggest customizing the image to form at least one customized image. First, as discussed above, Applicants respectfully disagree with the Examiner's position that Traversat et al. teaches creating an image of a device and therefore submit that Traversat et al. does not teach or suggest customizing an image. Furthermore, Applicants respectfully disagree with the Examiner's position that augmenting configuration information using a profile category, a user category, or a group category teaches customizing the image.

Since Traversat et al. neither discloses nor suggests the invention claimed in independent claim 1 and its dependent claims 2-12 or the invention claimed in independent claim 13 and its dependent claims 14-24, these claims clearly are not anticipated by Traversat et al.'s disclosure. For the foregoing reasons, reconsideration and allowance of these claims are requested.

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If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Dated: January 28, 2004

Customer No. 29315

Respectfully submitted,

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